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FEDERAL MARITIME COMMISSION



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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET AL

v.

MICHAEL HITRINOV ET AL

Consolidated With
DOCKET NO. 1953(I)

KAIRAT NURGAZINOV, ET AL

v.

MICHAEL HITRINOV ET AL

RESPONDENTS' RESPONSE TO COMPLAINANTS'
MOTION IN THE GUISE OF A STATUS REPORT

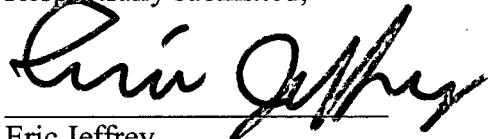
Earlier today, Complainants filed what they call a Status Report regarding the address of Empire United Lines. Had Complainants left it at that, there would be no cause to respond, other than to correct their error. But Complainants did not stop there, instead going on to make arguments in support of relief they have requested. Accordingly, Respondents are entitled to a response.

Complainants' claim that Empire United Line and Mr. Hitrinov have not been served with the motion to withdraw is entirely specious. They were both served by email, a permissible form of service (indeed the appropriate form of service) for a document filed by email. 46

C.F.R. 502.114. As previously explained, and as reflected in the contemporaneously-filed motion for an extension of time for Empire to respond to the undersigned's motion to withdraw, Empire and Mr. Hitrinov have in fact received the motion, at least by email, and we have been discussing it ever since. Mr. Hitrinov would be happy to confirm the above if the Presiding Officer deems it necessary, although its value seems microscopic.

Happy Thanksgiving to all.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Jeffrey", written over a horizontal line.

Eric Jeffrey

Nixon Peabody LLP

799 9th Street, N.W., Suite 500

Washington, D.C. 20001

202-585-8000

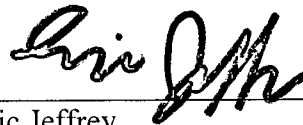
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Respondents' Response to Complainants' Motion in the Guise of a Status Report by first class mail to the following:

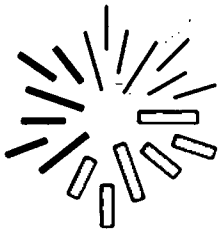
Marcus A. Nussbaum, Esq.
P.O. Box 245599
Brooklyn, NY 11224

Seth M. Katz, Esq.
P.O. Box 245599
Brooklyn, NY 11224

Date: November 22, 2016

A handwritten signature in black ink, appearing to read "Eric Jeffrey", is written over a horizontal line.

Eric Jeffrey
Counsel for Respondents



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NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Eric C. Jeffrey
Counsel
ejeffery@nixonpeabody.com

Nixon Peabody LLP
799 9th Street NW
Suite 500
Washington, DC 20001-4501
202-585-8000

November 22, 2016

VIA FIRST CLASS MAIL

Ms. Rachel Dickon
Assistant Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Dickon:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Motion for Extension of Time Regarding Motion to Withdraw;
2. Respondents' Response to Complainants' Motion in the Guise of a Status Report

If you have any questions, please do not hesitate to contact me.

Best regards,


Eric Jeffrey

Enclosures